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About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by a 3rd party company called NAVEX Global to help management and employees in a company work together in addressing fraud, abuse, and other misconduct or illegal activity in the workplace, all while cultivating a positive work environment.

Why is a system like EthicsPoint needed?

- INEOS believes that its employees are its most important asset. By creating open channels of communication, a positive work environment can be achieved.
- In some countries, companies are required by law to have an anonymous reporting system to address accounting and auditing fraud directly to the audit committee.
- An effective reporting system will support INEOS's efforts to foster a culture of integrity and ethical decision-making.

Reporting – General

May I report using either the Internet or the telephone?

Yes. With EthicsPoint, you can file a report via either the telephone or the Internet. This report will be held in confidence to the extent permitted by law and will only be used for the purpose of investigating your report. You may choose to identify yourself in the report or to remain anonymous.

What language should I use?

Using the telephone, you can report in the language of your country or in English. For Internet reporting, English will be used.

What type of situations should I report?

The EthicsPoint system is designed for employees to report any violation of issues such as:

- dangers to Safety, Health & the Environment (“SHE”) – but see below
- financial malpractice or impropriety or fraud
- failure to comply with a legal obligation or statutes
- criminal activity
- improper conduct or unethical behaviour
- attempts to conceal any of the above

If your violation or concern is SHE (Safety, Health, and Environment) related, you must first report it to local line management through the separate INEOS SHE reporting procedure.

Any fraud or accounting issues in the United States must be reported through the EthicsPoint service which enables you to report on an anonymous basis.

If I see a violation, shouldn't I just report it to my manager, or HR and let them deal with it?

When you observe any behaviour that you believe is illegal or violates our policies or code of conduct, INEOS expects you to report it. Ideally, you should raise them with your line manager, or other member of INEOS’s management team. INEOS recognises, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that INEOS has partnered with EthicsPoint. INEOS would rather you make a report through EthicsPoint than keep the information to yourself.

Why should I report what I know? What's in it for me?

We all have the right to work in a positive environment and with that right comes the responsibility of acting in an ethical manner and informing the appropriate individuals of inappropriate behaviour. By working together, a healthy and productive environment can be maintained. Corporate misconduct can threaten the livelihood of an entire company.

Does management really want me to report?

Yes. In fact, INEOS needs you to report. You are in the best position to know what matters are affecting the company - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimise potential damage to INEOS and your fellow employees. Additionally, offering positive input may help identify issues to improve corporate culture and performance.

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server to help ensure confidentiality. EthicsPoint makes these reports available only to specific individuals within the INEOS organization who will evaluate the report based on the type of reported violation and location of the incident. Each of these individuals has been trained in holding these reports in strict confidence. The report will not be sent to a person that has been named or implicated in the report.

Isn't this system just an example of someone watching over me?

No. Implementing EthicsPoint is a positive aspect of our overall philosophy, and allows us to assure a safe, secure, and ethical workplace by providing employees with an opportunity to report wrongdoing on a confidential basis (anonymously if necessary). Effective communication is critical in today's workplace and EthicsPoint is a great tool to enhance that communication.

Reporting Security & Confidentiality

It is my understanding that any report I send from a company computer generates a server log that shows every web-site that my PC connects with, and won't this log identify me as a report originator?

EthicsPoint does not generate or maintain any internal connection logs with IP addresses, meaning, no information linking your PC to EthicsPoint is available. In fact, EthicsPoint is contractually committed not to pursue a reporter's identity.

If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment (such as one located at an Internet café, at a friend's house, etc.) through the EthicsPoint secure website. Many people choose this option, as EthicsPoint's data shows that fewer than 12% of reports are generated during business hours.

Can I file a report from home and still remain anonymous?

A report from home, a neighbour's computer, or any Internet portal will remain secure and anonymous if you have chosen to remain anonymous. An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away Internet addresses so that anonymity is totally maintained. Plus, EthicsPoint is contractually committed not to pursue a reporter's identity.

I am concerned that the information I provide EthicsPoint will ultimately reveal my identity. How can you assure me that will not happen?

The EthicsPoint system is designed to protect your anonymity if you have chosen to remain anonymous. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, "From my desk/locker/... next to Jan Smith..." or "In my 33 years...".

Is the telephone toll-free hot line confidential and anonymous too?

Yes. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type your responses into the EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them during delivery.

What if I want to be identified with my report?

There is a section in the report for identifying yourself, if you wish. INEOS encourages you to identify yourself but would rather you make a report anonymously, than not make a report at all.

Tips & Best Practices

I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?

INEOS chooses to promote ethical behaviour. All unethical conduct, at any level, ultimately hurts INEOS, your fellow employees, and you. You only have to consider what happened in recent corporate scandals to see the disastrous effects that a seemingly harmless lapse in ethics can have on an otherwise healthy company. So, if you know of any incidents of misconduct or ethical violations, consider it a duty to yourself and your co-workers to report it.

I am not sure if what I have observed or heard is a violation of company policy, or involves unethical conduct, but it just does not look right to me. What should I do?

File a report. EthicsPoint can help you prepare and file your report so it can be properly understood. INEOS would rather you report a situation that turns out to be harmless than let possible unethical behaviour go unchecked due to uncertainty.

What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?

The EthicsPoint system and report distribution are designed to ensure the implicated parties will not be notified or granted access to the reports in which they have been named.

What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?

When you file a report at the EthicsPoint Web site or through the EthicsPoint Call Centre, you receive a unique report key and are asked to choose a password. You can return to the EthicsPoint system by Internet or telephone and access the original report to add more detail or answer questions from a company representative or add further information to assist in resolving open issues. INEOS strongly suggest that you return to the EthicsPoint Web site in the time specified to answer company questions. At that point, you and INEOS will have effectively entered into a dialogue, where situations are not only identified, but can also be resolved, no matter how complex.

Are these follow-ups on reports as secure as the first one?

All correspondence with EthicsPoint is held in the same level of confidence as your initial report, continuing under the umbrella of anonymity (to the extent you have chosen to remain anonymous).

Can I still file a report if I don't have access to the Internet?

You can call the EthicsPoint toll-free telephone hotline, which is available 24 hours a day, 365 days a year in local languages.

You can file an EthicsPoint report on the website, in English, from any computer that can access the Internet. You can file from home or many public locations, including the public library, that have connectivity to the Internet.